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VIA ECF AND HAND DELIVERY

Hon. George B. Daniels
United States District Judge
United States District Court
for the Southern District of New York
500 Pearl Street
New York, New York 10007-1312

Re: *Sokolow, et al. v. Palestinian Liberation Organization, et al.*
Docket No. 04-CV-397 (GBD)(RLE)

Dear Judge Daniels:

I write in response to defendants' letter of January 25, 2015, asking the Court to order certain redactions. [DE 773].

1. Exhibits 467 and 465

The Court ordered two types of additional redactions during the testimony of Israel Shrenzel: (1) omit the term "Person A" and (2) omit the word "Isthabarar." Plaintiffs have made the redactions as ordered.

Defendants' letter asked for additional redactions of the words "Mukata'a" and "Palestinian Authority." Defendants litigated and lost the redaction of "Palestinian Authority," Tr. 1060, and there is no reason to revisit that ruling here.¹ Further, as the Court has already indicated, the Mukata'a was simply the place where Noor committed his crime, and inclusion of that word is fully consistent with applicable case law on self-inculpatory statements. *See* Tr. 1404-05. Indeed, until their letter of January 25—after the word "Mukata'a" was read multiple times to the jury—defendants never asked for such a redaction.

¹ MR. SATIN: Your Honor, just to be clear, on the first page there's a lot of references to the Palestinian Authority.

THE COURT: I think those are appropriate references. They're not accusing the Palestinian Authority of committing any criminal act.

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2. Exhibit 451, Paragraph 68

Defendants ask that the name “Arafat” be redacted from paragraph 68. Plaintiffs have made this redaction.

3. Exhibit 452 (Abdullah Barghouti Verdict)

Defendants ask that plaintiffs redact the term “ Hamas Operative A” to refer to an individual implicated in the Hebrew University bombing. Although defendants earlier agreed to the redaction including “ Hamas Operative A,” plaintiffs will make the change. Plaintiffs also ask that they be permitted to correct certain redaction errors in the document that were made in haste on the night before Mr. Kaufman testified. In particular, numerous statements concerning the conspiracy in which Abdullah Barghouti participated were inadvertently redacted. The enclosed revision corrects those errors and also omits “ Hamas Operative A.”

Plaintiffs respectfully ask that the Court allow them to substitute the enclosed version of Exhibit 452 for the version that was earlier shown to the jury.

Respectfully,


Kent A. Yalowitz

Enclosures
cc: All ECF Counsel